

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	)	
Timothy D. Tatsak Jr. and	)	Case No.: 14-24264CMB
April L. Tatsak	)	Chapter 13
Debtor(s)	)	
	)	Related to Doc. #230 & 231
Lawrence Willis, Esquire	)	
Willis & Associates	)	
Applicant,	)	
	)	
Vs.	)	
Ronda J. Winnecour, Esquire,	)	
Chapter 13 Trustee	)	
Respondent(s)	)	

TRUSTEE'S OBJECTION TO MOTION TO WITHDRAW  
APPLICATION FOR COMPENSATION

1. This case was filed on October 23, 2014.
2. Ronda J. Winnecour is the Chapter 13 Standing Trustee in this case.
3. Lawrence Willis is Applicant and counsel of record for debtors.
4. Applicant filed a second fee Application seeking additional fees of \$1000.00.
5. The Trustee objected to the Application.
6. Counsel seeks to withdraw the Application, stating that he "wishes to refile the Application for Compensation to prorate travel and to make other changes that were addressed in the Trustee's objection."
7. The Trustee opposes the withdrawal of the Application.
8. Counsel can simply file an amended Application with no need for withdrawal.
9. The Trustee wishes for the matter to be heard. Withdrawing the Application creates a risk that counsel will never file an amended Application and the matter of the improper time entries will never be heard or explained.

WHEREFORE, the Trustee requests that the Motion to Withdraw Application be denied.

Respectfully Submitted,

January 31, 2020

/s/ Jana S. Pail  
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Ronda J. Winnecour, Esquire,	)	
Chapter 13 Trustee	)	
Respondent(s)	)	

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the foregoing document upon the following, by regular United States First Class Mail, postage prepaid, unless otherwise noted:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Office of the U.S. Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222

Timothy D. and April L. Tatsak  
144 Church Road  
Rural Valley, PA 16249

Lawrence W. Willis, Esquire  
Willis & Associates  
201 Penn Center Blvd.  
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Pittsburgh, PA 15235

M&T Bank  
PO Box 62182  
Baltimore, MD 21264

Ally Financial  
Serviced by Ally Servicing LLC  
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414 Ford Street  
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1-31-2020

/s/ Rosa M. Richard  
Administrative Assistant  
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